

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: KEON FRANK : CHAPTER 13  
Debtor(s) : BANKRUPTCY NO. 23-11974AMC

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**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Keon Frank has filed with the Court a Motion to Approve Sale of Property to pay off her Chapter 13 Plan in full.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**
2. **If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **February 27, 2025**, you or your attorney must file a response to the Motion.** *(see instructions on next page)*
3. **A hearing on the Motion is scheduled to be held on **March 11, 2025, at 10:00 a.m. in, in front of the Honorable Ashely M. Chan by telephone conference: Zoom Phone #: 1-646-828-7666; Meeting ID 160 6807 8081 (no participant ID is necessary)** . Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.**
4. **If you do not file a response to the Motion**, the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.**
8. **If you are not required to file electronically, you must file your response at**  
  
Clerk's Office, 4<sup>th</sup> Floor  
900 Market Street, Suite 400  
Philadelphia, PA 19107
9. **If you mail your response** to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Paul H. Young, Esquire  
Young, Marr & Associates  
3554 Hulmeville Road, Suite 102  
Bensalem, PA 19020  
Phone: (215) 639-5297  
Fax: (215) 639-1344  
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